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and

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*Attorneys for Defendants,
 Walmart Inc. and Jetson Electric Bikes, LLC*

**IN THE UNITED STATES DISTRICT COURT
 FOR THE DISTRICT OF WYOMING**

STEPHANIE WADSWORTH)
 Individually and as Parent and Legal Guardian)
 of W.W., K.W., G.W., and L.W., minor children)
 and MATTHEW WADSWORTH,)

Plaintiffs,)

v.)

WALMART INC. and)
 JETSON ELECTRIC BIKES, LLC,)

Defendants.)

Case No. 2:23-cv-00118-NDF

**DECLARATION OF
 EUGENE M. LAFLAMME
 IN SUPPORT OF RESPONSE
 MEMORANDUM IN
 OPPOSITION TO PLAINTIFFS’
 MOTION TO EXCLUDE
 EXPERT TESTIMONY OF
 GREGORY E. GORBETT**

I, Eugene M. LaFlamme, state as follows:

1. I am an attorney at McCoy Leavitt Laskey LLC located in Waukesha, Wisconsin.
 2. I am one of the attorneys of record for Defendants, Jetson Electric Bikes, LLC and Walmart Inc., admitted *pro hac vice* on August 24, 2023.
 3. This case involves a February 1, 2022 residential fire in Green River, Wyoming.
 4. The primary liability dispute between the parties is whether the fire originated at a Jetson Plasma hoverboard by the bedroom door of G.W. and L.W.'s bedroom or a smoking shed located outside the bedroom window of G.W. and L.W.
 5. I attended the deposition of expert Brian N. Strandjord, PE, CFI, CFEI taken on November 27, 2024.
 6. Attached as Exhibit 1 is a true and correct copy of NFPA 921 (2021 ed) sections 4.4.3.3, 18.6.2.2, 21.4.8, and 21.4.8.3.3.
 7. Attached as Exhibit 2 is a true and correct copy of NFPA 921 (2024 ed) sections 4.4.3.3, 18.6.2.2, 21.4.8, and 21.4.8.3.3.
 8. Attached as Exhibit 3 are the pertinent portions of expert Gregory Gorbett's deposition taken on October 24, 2024.
 9. Attached as Exhibit 4 is a true and correct copy of the expert report prepared by Fire Dynamics Analysts' Gregory E. Gorbett, Ph.D., IAAI-CFI, CFEI, CFII, CFPS, CVFI dated September 9, 2024.
 10. Attached as Exhibit 5 are the pertinent portions of Plaintiff Stephanie Wadsworth's deposition taken on February 27, 2024.
 11. Attached as Exhibit 6 are the pertinent portions of Plaintiffs' origin and cause expert Michael J. Schulz's deposition taken on September 10, 2024.
- I declare under penalty of perjury that the foregoing is true and correct.

Executed: December 16, 2024



Eugene M. LaFlamme